

EXHIBIT Q

Priselac, Jessica

From: Ferretti, Joseph S. <JSFerretti@duanemorris.com>
Sent: Friday, August 28, 2020 11:21 PM
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'aslater@mazieslater.com'; 'dnigh@levinlaw.com'; 'c.whiteley@kanner-law.com'
Cc: 'bvp@kirtlandpackard.com'; 'argenal@csdisco.com'; 'valpec@kirtlandpackard.com';
'CohenL@gtlaw.com'; 'cct@pietragallo.com'; 'Jheinz@c-wlaw.com';
'jpoletto@hkmpp.com'; 'alexia.brancato@kirkland.com'; Klein, Alan; Goldberg, Seth A.;
Priselac, Jessica; Bazan, Rebecca; Schwartz, Barbara; Hill, Coleen W.;
'valsartan@csdisco.com'
Subject: Valsartan: Document Production Volumes ZHP015, ZHP016, and ZHP017
Attachments: 8-28-20 Cover Letter Regarding Document Production Volumes ZHP015, ZHP016, and
ZHP017.pdf; ZHP Defendants Production Index, 8-28-20.XLSX

Counsel,

Please see the attached letter and production index.

As I understand it, Plaintiffs have been given access to the Aquipt document repository to download the above-referenced production volumes. Please let me know if you have any difficulty accessing the documents.

Best Regards,

Joseph S. Ferretti

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ZHP Defendants - Production Index <i>In re Valsartan, Losartan, and Irbesartan Products Liability Litigation</i> , No. 19-md-2875						
Volume No.	Date Sent	Bates Range	Source(s)	Replacement	Reason for Replacement Production	Date of Replacement with No Protected Designation for Applicable Bates Range(s)
ZHP013	7/15/2020	ZHP00013160 - ZHP00063692	Non-custodial files (ZHP Hardcopy Documents from Chuannan and Xunqiao)	N/A	N/A	N/A
SOLCO009	7/24/2020	SOLCO0000527 - SOLCO00005439	Non-custodial files (Regulatory Files)	N/A	N/A	N/A
PRINSTON017	7/24/2020	PRINSTON00083850 - PRINSTON00083862	Non-custodial files (Regulatory Files)	N/A	N/A	N/A
ZHP014	7/31/2020	ZHP00063693 – ZHP00071545	Non-custodial files (ZHP Hardcopy Documents from Chuannan and Xunqiao)	N/A	N/A	N/A
N/A	8/10/2020	N/A	N/A	Partial Replacement. Overlay files for Production Vols. ZHP011-ZHP014	Supplementing three metadata fields	N/A
ZHP015	8/28/2020	ZHP00071546 – ZHP00076041	Non-custodial files (Batch Records)	N/A	N/A	N/A
ZHP016	8/28/2020	ZHP00076042 – ZHP00117715	Custodial files (Jun Du, Remonda Gergis, Xiaodi Guo, Lijie Wang)	N/A	N/A	N/A
ZHP017	8/28/2020	ZHP00117716 – ZHP00120312	Non-custodial files (Nitrosamine Testing Records)	N/A	N/A	N/A